



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

February 17, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Nu-Wood Company / F039-18016-00586

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 9/16/03



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Nu-Wood Company LLC  
1722, N. Eisenhower Drive  
Goshen, Indiana 46526**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-18016-00586	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 17, 2004  Expiration Date: February 17, 2009

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A1 through A3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary urethane decorative moldings and millwork manufacturing source.

Authorized individual:	John Grecco, President and CEO
Source Address:	1722 N. Eisenhower Drive Goshen Indiana 46526
Mailing Address:	1722 N. Eisenhower Drive Goshen Indiana 46526
General Source Phone:	574-534-1192
SIC Code:	3086
Source Location Status:	Elkhart
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Spray Booth # 1, constructed in 1998 and exhausting to stack identified as 001, with:
  - (1) maximum hourly capacity of coating 30 silicone rubber molds per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (b) Spray Booth # 2, constructed in 1998 and exhausting to stack identified as 002, with:
  - (1) a maximum hourly capacity of coating 20 silicone rubber molds per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (c) Spray Booth # 3, constructed in 1998 and exhausting to stack identified as 003, with:
  - (1) a maximum hourly capacity of coating 50 polyurethane millwork parts per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (d) Spray Booth # 4, to be constructed in 2004 and exhausting to stack identified as 006, with:
  - (1) a maximum hourly capacity of coating 35 urethane millwork parts per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.

- (e) Sanding and Finishing operations, exhausting to stack identified as stack 004, consisting of sander # 1, sander # 3, table saw, miter saw, band saw and table router constructed in 1998 and sander # 2 constructed in 2002, with:
  - (1) a maximum hourly capacity of processing 50 polyurethane millwork parts per hour; and
  - (2) baghouse as a control device for particulate matter.

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A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Urethane Machine # 1, constructed in 1998 and exhausting to stack identified as stack 002, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate of 9.096 pounds of solvent per day. Solvent is a mixture of 80 %methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold.
- (b) Urethane Machine #2, constructed in 1998 and exhausting to stack identified as stack 005, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate of 9.096 pounds of solvent per day. Solvent is a mixture of 80 %methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold.
- (c) Urethane Machine #3, constructed in 1998 and used as a back up machine exhausting as fugitives, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate of 9.096 pounds of solvent per day. Solvent is a mixture of 80 %methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold.

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A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.



## **SECTION B                      GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.9      Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.13 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
Facsimile No.: 317-245-4877 (Northern regional office)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

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B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;



- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (2) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**C.8 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.10 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.11 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

#### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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If a regulated substance as defined in is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by April 15<sup>th</sup> in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

### **C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015



- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Spray Booth # 1, constructed in 1998 and exhausting to stack identified as 001, with:
  - (1) maximum hourly capacity of coating 30 silicone rubber molds per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (b) Spray Booth # 2, constructed in 1998 and exhausting to stack identified as 002, with:
  - (1) a maximum hourly capacity of coating 20 silicone rubber molds per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (c) Spray Booth # 3, constructed in 1998 and exhausting to stack identified as 003, with:
  - (1) a maximum hourly capacity of coating 50 polyurethane millwork parts per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (d) Spray Booth # 4, to be constructed in 2004 and exhausting to stack identified as 006, with:
  - (1) a maximum hourly capacity of coating 35 polyurethane millwork parts per hour;
  - (2) dry filters as control devices for overspray; and
  - (3) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.

(The information describing the process contained in this facility description box is descriptive

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification to the surface coating operation that may increase the potential to emit VOC from spray booths 1 through 4 to 25 tons or more per year each shall obtain prior approval from IDEM, OAQ pursuant to the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), before such modification can take place.

#### D.1.2 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the four (4) spray paint booths (1 through 4) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.3 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds (VOC)**

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Compliance with the VOC usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.6 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (001, 002, 003 and 006) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used less water on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Conditions D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Sanding and Finishing operations, exhausting to stack identified as 004, consisting of sander # 1, sander # 3, table saw, miter saw, band saw and table router constructed in 1998 and sander # 2 constructed in 2002 with:

- (1) a maximum hourly capacity of processing 50 polyurethane millwork parts per hour; and
- (2) Baghouse as a control device for particulate matter.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the sanding and finishing operations shall not exceed 1.342 pounds per hour when operating at a process weight rate of 378 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

#### D.2.2 Particulate Matter 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the sanding and finishing operation shall not exceed 1.342 pounds of PM-10 per hour. Based on 8,760 hours the PM-10 emissions from sanding and finishing operations shall be limited to 5.87 tons, after controls, per 12-month rolling period. This limit will keep the source wide PM-10 emissions less than 100 tons per year. Therefore, compliance with this limit will satisfy 326 IAC 2-8-4, and will render the Part 70 rules (326 IAC 2-7) not applicable.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions 2.1 and 2.2, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.2.5 Particulate Control**

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In order to comply with condition D.2.1, the baghouse for particulate control shall be in operation and control emissions from the sanding and finishing operations at all times that the sanding and finishing operations are in operation.

### **D.2.6 Visible Emissions Notations**

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- (a) Visible emission notations of the sanding and finishing operations stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

### **D.2.7 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sanding and finishing operations, at least once per shift when the sanding and finishing operations are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

### **D.2.8 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### D.2.9 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of once per shift visible emission notations of the sanding and finishing operations stack exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
  - (1) Once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Urethane Machine # 1, constructed in 1998 and exhausting to stack identified as stack 002, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate 9.096 pounds of solvent per day. Solvent is a mixture of 80 %methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocynate to a rubber mold.
- (b) Urethane Machine #2, constructed in 1998 and exhausting to stack identified as stack 005, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate 9.096 pounds of solvent per day. Solvent is a mixture of 80 %methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocynate to rubber mold.
- (c) Urethane Machine # 3, constructed in 1998 and used as a back up machine exhausting as fugitives, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate 9.096 pounds of solvent per day. Solvent is a mixture of 80 %methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocynate to rubber mold.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-5(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.



D.3.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9) [326 IAC 2-8-4(9)]]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

D.3.3 Record Keeping Requirements

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- (a) To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Nu-Wood Company, LLC  
Source Address: 1722 N. Eisenhower Drive Goshen Indiana 46526  
Mailing Address: 1722 N. Eisenhower Drive Goshen Indiana 46526  
FESOP No.: F039-18016-00586

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)\_\_\_\_\_
- ☐ Report (specify)\_\_\_\_\_
- ☐ Notification (specify)\_\_\_\_\_
- ☐ Affidavit (specify)\_\_\_\_\_
- ☐ Other (specify)\_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Nu-Wood Company, LLC  
Source Address: 1722 N. Eisenhower Drive Goshen Indiana 46526  
Mailing Address: 1722 N. Eisenhower Drive Goshen Indiana 46526  
FESOP No.: F039-18016-00586

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>? The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Nu-Wood Company, LLC  
Source Address: 1722 N. Eisenhower Drive Goshen Indiana 46526  
Mailing Address: 1722 N. Eisenhower Drive Goshen Indiana 46526  
FESOP No.: F039-18016-00586

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked **No deviations occurred this reporting period**.

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the  
Technical Support Document (TSD) for a Federally Enforceable Operating  
Permit (FESOP)**

**Source Background and Description**

**Source Name:** Nu-Wood Company, LLC  
**Source Location:** 1722 N. Eisenhower Drive, Goshen, Indiana 46526  
**County:** Elkhart  
**SIC Code:** 3086  
**Operation Permit No.:** F039-18016-00586  
**Permit Reviewer:** RT / EVP

On January 13, 2004, the Office of Air Quality (OAQ) had a notice published in Elkhart Truth in Elkhart, Indiana, stating that Nu-Wood Company, LLC had applied for FESOP for the operation of stationary urethane decorative moldings and millwork manufacturing plant. The notice also stated that OAQ proposed to issue FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On February 9, 2004, OAQ received comments from Nu-Wood through their environmental consultant. Additionally, on February 2, 2004, OAQ received comments from Northern Regional Office (NRO). All comments received are in relation to the proposed FESOP.

The summary of the comments and related responses follows, with the comments received from Nu-Wood representative presented first, and the comments from NRO second. Any changes made to the permit as a result of the following comments are shown in bold and deleted permit language is shown with a line through it. Permit changes affecting the permit's Table of Contents are also revised without replication herein.

Comments Received from Nu-wood:

**Comment 1:**

Page 26, D.1.6 Monitoring, (b): requires monthly inspections for the presence of overspray on the rooftops. Nu-wood does not have an easily accessible method for examining the rooftop. We believe that the daily filter inspections, weekly stack observations, and the monthly inspections of nearby ground should suffice to ensure compliance with the applicable filter control requirement. Therefore, we request that the requirement for the rooftop inspections be deleted.

If this requirements cannot be deleted, then we request that the permit include an exemption for when the rooftop is covered with snow, and the requirements be changes to annual (or less frequent) inspection.

### Response to Comment 1:

Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. The IDEM believes that checking the evidence of monthly deposition on the rooftops in addition to daily filter inspections, weekly stack observations, and the monthly inspections of nearby ground is a very effective means of ensuring proper operation and ongoing compliance. Hence no changes will be made to the condition.

### Comment 2:

Page 28, D.2.4. Testing requirements. The permit requires testing for PM and PM 10 within 180 days and every five years, in order to assure compliance with PM limit in 326 IAC 6-3-2. We believe that use of 99.9 % efficient baghouse, proper operation and maintenance of the baghouse, and regulate inspections- as required elsewhere in the permit-should be sufficient to ensure compliance with the state PM rule. Therefore, we request that the testing requirements be removed.

### Response to Comment 2:

Properly operating the air pollution controls (baghouse) that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test. Since the source is moving to a new location, IDEM believes that testing for PM and PM 10 should be done once within 180 days to ensure that PM 10 limit is met and thus satisfying 326 IAC 2-8-4 and 326 IAC 6-3, and will render the Part 70 rules (326 IAC 2-7) not applicable. However, the requirement to do stack test once every five years is removed from the final document owing to the fact that if the initial test confirms the control efficiency of baghouse as 99.9%, then the controlled emissions are significantly lower than the allowable emissions. The condition D.2.4 is changed as shown below.

#### D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions 2.1 and 2.2, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. ~~This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.~~ Testing shall be conducted in accordance with Section C- Performance Testing.

### Comment 3:

Page 32-34 specify that 40 CFR Part 63, Subpart T is applicable to this facility. In our process, solvent is pumped through a hose to urethane machines, through the mix heads, and from there directly into a waste drum. The purpose of cleaning is to remove residual urethane from the machines.

The cleaning process does not consist of a tank in which parts are dipped, which seems to be the intent of the Subpart T rule. The process does not meet the definitions of batch vapor, batch cold, or in-line machines contained in the regulations.

To further research this issue, we contacted Mr. Paul Almadovar, an Environmental Engineer with the USEPA Coating and Consumer Products Group. He confirmed our interpretation that Subpart T covers equipment designed to use halogenated solvents for cleaning, not solvent "flushing" operations such as those used at our facility. A copy of the correspondence to Mr. Almadovar is attached.



### Response to Comment 3:

After reviewing USEPA's correspondence, IDEM has decided to remove conditions related to 40 CFR 63, Subpart T requirements from section D.3. Section D.3 conditions are changed as shown below.

The 40 CFR 63, Subpart T requirements in Technical Support Document (TSD) are void.

### Emission Limitations and Standards [326 IAC 2-8-5(1)]

#### ~~D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]~~

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~~The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.~~

#### ~~D.3.2 Halogenated Solvent Cleaning NESHAP [326 IAC 20-6-1][40 CFR Part 63, Subpart T]~~

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~~This facility is subject to 40 CFR Part 63, Subpart T, which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.~~

- ~~(a) The Permittee shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.~~
- ~~(b) The following work and operational practice requirements for Urethane machines # 1 through 3 are also applicable:~~
  - ~~(1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.~~
  - ~~(2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.~~
  - ~~(3) The Permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.~~
  - ~~(4) The Permittee shall ensure that the solvent line does not exceed the fill line.~~
  - ~~(5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of condition D.3.2 (b)(1).~~
  - ~~(6) When an air or pump-agitated solvent bath is used, the Permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.~~
  - ~~(7) The Permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.~~

~~(8) Sponges, fabric, wood, and paper products shall not be cleaned in the degreasing operation.~~

**D.3.3 1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

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Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**D.3.4 2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9) [326 IAC 2-8-4(9)]]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

**~~Compliance Determination Requirements~~**

**~~D.3.5 Testing Requirements [326 IAC 2-1.1-11] 326 IAC 2-8-5(a)(1)&(4)]~~**

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~~The Permittee is not required to test this facility by this permit or by 40 CFR 63.465, Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.~~

**Record Keeping and Reporting Requirements [326 IAC 2-8-5(3)] [326 IAC 2-8-19]**

**~~D.3.6 Reporting Requirements~~**

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- ~~(a) As required under 40 CFR 63.468(b), the Permittee shall submit an initial notification report as soon as practicable before construction or reconstruction of urethane machines # 1 through 3 are planned to commence. The report shall include all of the information required in 40 CFR 63.5(d)(1), with the following revisions and additions:~~
  - ~~(1) A brief description of urethane machines # 1 through 3 including machine type (i.e., batch cold), solvent/air interface area, and existing controls.~~
  - ~~(2) The anticipated compliance approach for urethane machines # 1 through 3.~~
  - ~~(3) In lieu of 40 CFR 63.5(d)(1)(ii)(H), an estimate of annual halogenated HAP solvent consumption for urethane machines # 1 through 3.~~

- ~~(b) As required under 40 CFR 63.468(c), the Permittee shall submit a compliance report for urethane machines # 1 through 3 no later than 150 days after startup. This report shall include the following requirements:~~
- ~~(1) The name and address of the Permittee;~~
- ~~(2) The address (i.e., physical location) of urethane machines # 1 through 3;~~
- ~~(3) A statement signed by the Permittee, stating that urethane machines # 1 through 3 are in compliance with the provisions of 40 CFR Part 63, Subpart T.~~
- ~~(4) The compliance approach for urethane machines # 1 through 3.~~
- ~~(c) The reports required in Conditions D.3.6 (a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:~~

~~United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

### **D.3.3 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

#### **Comment 3:**

Typos: There are several minor typos in the draft and associated Technical Support Document (TSD):

- (a) Page 1, there are extra commas in the address (1722. N. Eisenhower Drive).
- (b) Page 28, (b): Change "shall maintain of records" to "shall maintain records"
- (c) TSD, Page 4, table: Change "snading" to "sanding"
- (d) TSD, page 8, 326 IAC 8-1-6: Change "suing" to "using"
- (e) TSD, page 9, (b): Change "operartions" to "operations"

#### **Response to Comment 3:**

The final permit document will be revised as requested.

IDEM also decided to make the following changes to the proposed permit.

#### **Revision 1**

There is an inconsistency between ninety days and 30 days in Condition C.12, Compliance Monitoring. That has been rectified as shown below.

**C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ~~ninety~~ **thirty** (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ~~ninety~~ **thirty** (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ~~ninety~~ **thirty** (30) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**Revision 2:**

Since the PM emissions after controls are less than 100 tons per year, the source is not required to develop Emergency Reduction Plans (ERPs). Therefore, condition C.15 will be deleted from the final document.

**Revision 3:**

The date April 15<sup>th</sup> is added to the condition C.1.8, Emissions Statement, to specify that emission statement must be received by that date. The change to the condition is shown below.

**C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received **by April 15<sup>th</sup>** in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a Federally Enforceable Operating Permit  
(FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Nu-Wood Company, LLC</b>
<b>Source Location:</b>	<b>1722 N. Eisenhower Drive, Goshen, Indiana 46526</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3086</b>
<b>Operation Permit No.:</b>	<b>F039-18016-00586</b>
<b>Permit Reviewer:</b>	<b>RT/ EVP</b>

The Office of Air Quality (OAQ) has reviewed a FESOP application from Nu-wood Company, LLC relating to the operation of stationary urethane decorative moldings and millwork manufacturing source, which will be moved from 2508 Industrial Park Drive, Goshen, IN 46526 to 1722 N. Eisenhower Drive, Goshen, Indiana 46526.

**Permitted Emission Units and Pollution Control Equipment**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) Previously Permitted Emission Units

- (1) Spray Booth # 1, constructed in 1998 and exhausting to stack identified as 001, with:
  - (A) maximum hourly capacity of coating 30 silicone rubber molds per hour;
  - (B) dry filters as control devices for overspray; and
  - (C) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (2) Spray Booth # 2, constructed in 1998 and exhausting to stack identified as 002, with:
  - (A) a maximum hourly capacity of coating 20 silicone rubber molds per hour;
  - (B) dry filters as control devices for overspray; and
  - (C) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.
- (3) Spray Booth # 3, constructed in 1998 and exhausting to stack identified as 003, with:
  - (A) a maximum hourly capacity of coating 50 polyurethane millwork parts per hour;
  - (B) dry filters as control devices for overspray; and
  - (C) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.

(b) New Construction Emission Units

- (1) Spray Booth # 4, to be constructed in 2004 and exhausting to stack identified as 006, with:
  - (A) a maximum hourly capacity of coating 35 polyurethane millwork parts per hour;
  - (B) dry filters as control devices for overspray; and
  - (C) one (1) 15 pound per square inch (psi) spray coating gun and using high volume low pressure application.

(c) Previously Unpermitted Emission Units

- (1) Sanding and Finishing operations, exhausting to stack identified as stack 004, consisting of sander # 1, sander # 3, table saw, miter saw, band saw and table router constructed in 1998 and sander # 2 constructed in 2002, with:
  - (A) a maximum hourly capacity of processing 50 polyurethane millwork parts per hour; and
  - (B) baghouse as a control device for particulate matter.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Urethane Machine # 1, constructed in 1998 and exhausting to stack identified as stack 002, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate of 9.096 pounds of solvent per day. Solvent is a mixture of 80 % methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold.
- (b) Urethane Machine #2, constructed in 1998 and exhausting to stack identified as stack 005, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate of 9.096 pounds of solvent per day. Solvent is a mixture of 80 % methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold.
- (c) Urethane Machine #3, constructed in 1998 and used as a back up machine exhausting as fugitives, with:
  - (1) a maximum hourly capacity of filling urethane at 20 silicone rubber molds per hour;
  - (2) closed equipment, cleaned with a solvent, and having a consumption rate 9.096 pounds of solvent per day. Solvent is a mixture of 80 % methyl chloroform and 20 % methanol; and
  - (3) makes polyurethane millwork parts by applying two-part mixture of urethane and isocyanate to a rubber mold.

**Existing Approvals**

The source does not have any previous approvals.

## Enforcement Issue

Currently, sanding and finishing operations, and urethane machine # 1, which will be moved to the proposed new location (1722 N. Eisenhower Drive Goshen, IN 46526), are unpermitted. In 2002, when the largest sander, sander # 2 along with the bag house with 99.9% control efficiency, was installed the source was subject to the requirements of 326 IAC 2-7 (Part 70) or 326 IAC 2-8 (FESOP) because the source had a potential to emit greater than 100 per year of PM-10 due to the unpermitted sanding and finishing operations. The solvent cleaning operations in the urethane machines # 1 through 3, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-6 (40 CFR 63, Subpart T), which was not incorporated in CP-039-9299 permit issued in 1998.

## Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:  
Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on September 25, 2003. Additional information was received on December 18, 2003.

## Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 through 5 )

## Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Unrestricted Potential to Emit (tons/yr)
PM	Greater than 100, less than 250
PM-10	Greater than 100, less than 250
SO <sub>2</sub>	Less than 100
VOC	Less than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100

HAPs	Unrestricted Potential to Emit (tons/yr)
Specify the HAP	
Glycol Ethers	Less than 10
Methanol	Less than 10
Methyl Chloroform	Less than 10
Total	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Spray Booth 1	4.87	4.87	0	7.48	0	0	0.76
Spray Booth 2	3.25	3.25	0	4.98	0	0	0.51
Spray Booth 3	11.7	11.7	0	1.42	0	0	1.27
Spray Booth 4	8.19	8.19	0	0.99	0	0	0.89
Urethane Molding	0	0	0	0.04	0	0	0.04
Snading and Finishing Operation	5.87 <sup>(1)</sup>	5.87 <sup>(2)</sup>	0	0	0	0	0
Solvent Cleaning	0	0	0	1.67	0	0	1.67
Total Emissions	33.88	33.88	0	16.58	0	0	5.14

- (1) Maximum allowable PM emissions in order to comply with 326 IAC 6-3-2.  
(2) Assuming PM-10 = PM

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment



- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Elkhart County has been classified as attainment for remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The solvent cleaning operations in the urethane machines # 1 through 3, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-6 (40 CFR 63, Subpart T) because the solvent cleaning operations in urethane machines # 1 through 3 meet the definition of batch cold solvent cleaning machine and they use 1,1,1-trichloroethane in a total concentration greater than (>) 5% by weight, as a cleaning agent.
  - (1) Pursuant to 40 CFR, Subpart T, the solvent cleaning operations in the urethane machines # 1 through 3 are subject to the following requirements.
    - (A) The Permittee shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
    - (B) The following work and operational practice requirements for urethane machines # 1 through 3 are also applicable:
      - (i) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
      - (ii) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
      - (iii) The Permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
      - (iv) The Permittee shall ensure that the solvent line does not exceed the fill line.
      - (v) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of condition (B)(i).
      - (vi) When an air- or pump-agitated solvent bath is used, the Permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.

- (vii) The Permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
  - (viii) Sponges, fabric, wood, and paper products shall not be cleaned in the degreasing operation.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, which meets the following criteria:
  - (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
  - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
  - (3) The unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

#### **State Rule Applicability – Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

The source was constructed in 1998 at the previous location, after the PSD applicability of August 7, 1977 and the source is not one of the 28 listed source categories. Based on the unrestricted potential emissions, including modifications, the source has always a PSD minor at previous location and will continue to be PSD minor at the new location because no attainment regulated pollutant will be emitted at a rate of 250 tons per year or more. Therefore the requirements of 326 IAC 2-2 (PSD) does not apply.

##### **326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any source that constructs or reconstructs a major source of HAPs, which has the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, must control emissions from that source using technologies consistent with the Maximum Achievable Control Technology (MACT). This source to be constructed has potential single HAP and total HAP emissions of less than 10 and 25 tons per year, respectively; therefore, this rule does not apply.

##### **326 IAC 2-6 (Emission Reporting)**

This source is located in Elkhart County and the potential to emit VOC, is greater than 10 tons per year. Therefore, the source is subject to the requirements of 326 IAC 2-6.

##### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 2-8-4 (Particulate Matter 10 Microns (PM-10) limitation)**

Pursuant to 326 IAC 2-8-4, particulate matter 10 microns emissions from the sanding and finishing operations shall not exceed 1.342 pounds of PM-10 per hour, including both filterable and condensable fractions. Based on 8,760 hours the PM-10 emissions from sanding and finishing operations shall be limited to 5.87 tons, after controls, per 12- consecutive month period. The source will comply with this limit by using a baghouse, for sanding and finishing operations, with 99.9 % control efficiency.

**State Rule Applicability – Individual Facilities**

**326 IAC 6-3-2 (Process Operations)**

Pursuant to [40 CFR 52 Subpart P, the PM from the four (4) spray paint booths (1 through 4) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Process)**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the sanding and finishing operations shall not exceed 1.342 pounds per hour when operating at a process weight rate of 378 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The source will comply with this limit by using a baghouse, for sanding and finishing operations, with 99.9 % control efficiency.

**326 IAC 8-3-2 (Volatile Organic Compound)**

The solvent cleaning process in urethane machines # 1 through 3 is a cold cleaner degreaser operations remote solvent reservoirs. Therefore, the solvent cleaning operations are subject to 326 IAC 8-3-2 but not 326 IAC 8-3-5.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;

- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### 326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

New facilities (as of January 1, 1980), which have potential to emit more than 25 tons or more per year, located anywhere in the state, and which are not otherwise regulated by other provisions of this article (326 IAC 8), shall reduce VOC emissions using best achievable control technology (BACT) (326 IAC 8-1-6).

The potential to emit VOC from urethane machines # 1 through 3 and the spray booths 1 through 4 is less than 25 tons per year from both the emissions units. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

#### Testing Requirements

During the period within 180 days after issuance of this permit, in order to demonstrate compliance with FESOP limit and 326 IAC 6-3-2 limit, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10.

This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

#### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The spary booths 1 through 4 have applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (001, 002, 003 and 006) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (b) The sanding and finishing opearions has applicable compliance monitoring conditions as specified below:
- (1) In order to comply with condition D.2.1, the baghouse for particulate control shall be in operation and control emissions from the sanding and finishing operations at all times that the sanding and finishing operations are in operation.
  - (2) Visible emission notations of the sanding and finishing operations stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (3) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (4) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (5) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (6) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

- (7) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the sanding and finishing operations, at least once per shift when the sanding and finishing operations are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (8) An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (9) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (10) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the sanding and finishing operations must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emissions Limitations from Manufacturing process), and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this stationary urethane decorative moldings and millwork manufacturing source shall be subject to the conditions of the FESOP 039-18016-00586.

Appendix A: Emissions Calculations

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**Potential Emissions from Spray Booths**

**Company Name:** Nu-Wood Company, LLC  
**Address City IN Zip:** 2508 Industrial drive Goshen Indiana  
**FESOP** F039-18016-00586  
**Reviewer:** RT/ EVP  
**Date:** December 17, 2003

Spray Booth No.	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
1	In Mold, White	10.9	48.70%	29.0%	19.7%	37.7%	29.50%	0.02650	30.000	3.45	2.15	1.71	40.97	7.48	4.87	7.28	75%
2	In Mold, White	10.9	48.70%	29.0%	19.7%	37.7%	29.50%	0.02650	20.000	3.45	2.15	1.14	27.31	4.98	3.25	7.28	75%
3	Acrylics Mill work Primer	12.8	37.20%	35.3%	1.9%	54.4%	42.50%	0.02650	50.000	0.54	0.24	0.32	7.76	1.42	11.70	0.57	75%
4	Acrylics Mill work Primer	12.8	37.20%	35.3%	1.9%	54.4%	42.50%	0.02650	35.000	0.54	0.24	0.23	5.43	0.99	8.19	0.57	75%

**3.39      81.47      14.87      28.00**

**State Potential Emissions**  
**METHODOLOGY**  
**Add worst case coating to all solvents**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used



**Potential HAP emissions from Spray Booths**

**Company Name:** Nu-Wood Company, LLC  
**Address City IN Zip:** 2508 Industrial drive Goshen Indiana  
**FESOP** F039-18016-00586  
**Reviewer:** RT/ EVP  
**Date:** December 17, 2003

Spray Booth	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
1	In Mold, White	10.9	0.03	30.00	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.76	
2	In Mold, White	10.9	0.03	20.00	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.51	0.00
3	Acrylics Mill work Primer	10.9	0.03	50.00	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	1.27	0.00
4	Acrylics Mill work Primer	10.9	0.03	35.00	0.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.00	0.00	0.00	0.89	0.00
Total State Potential Emissions											<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>3.42</b>	<b>0.00</b>

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Potential Emissions from Solvent Cleaning**

**Company Name:** Nu-Wood Company, LLC  
**Address City IN Zip:** 2508 Industrial drive Goshen Indiana  
**FESOP** F039-18016-00586  
**Reviewer:** RT/ EVP  
**Date:** December 17, 2003

**Solvent Emissions:**

Solvent density  
Amt. Solvent used in 2002: 61,307 lb /yr solvent  
Amt. of solvent shipped for recycling: 60,550 lb/yr solvent

Emissions (Assume that was not recovered for recycling was emitted)  
758 lb / yr solvent

Solvent is about 85 % methyl chloroform and 15 % methanol:  
650.74 lb / yr of methyl chloroform  
113.7 lb / yr of methanol

The emissions occurred in the period of 2000 hours

Therefore the potential emissions based on 8760 hours are:  
1.43 lb / yr of methyl chloroform  
0.25 lb / yr of methanol

**Total solvent HAP emissions** 1.67

**4,4'-methylene diphenyl diisocyanate (MDI) emissions from urethane operations**

According to the document "MDI/Polymeric Emissions reporting Guidelines for Polyurethane industry,"  
by the Alliance for the polyurethane's industry.

MDI emissions from these types of operations are extremely low due to the low Vapor pressure of MDI

Emissions should be < 0.01 lb / hr, making this an exempt process (Except for the solvent usage)

**0.01 lb/ yr = 0.0438 tpy**

***Potential Emissions from Sanding and Grinding Operations***

**Company Name:** Nu-Wood Company, LLC  
**Address City IN Zip:** 2508 Industrial drive Goshen Indiana  
**FESOP** F039-18016-00586  
**Reviewer:** RT/ EVP  
**Date:** December 17, 2003

**Particulate Matter Calculation-Sanding and Grinding Operations**

According to the plant data in 2002, 39860 pounds particulate matter (PM) during 9 month period.

This equates to  $39860 \times 12 \text{ months} / 9 \text{ months} =$  **53,147 lb /yr in 2003**

If the bag house has an efficiency of 99.9 % then the total amount entering the bag house is  $53,147 / 0.999 =$  **53,200 lb/ yr entering the bag house**

This number above is the actual plant operation based on 200 hours. Therefore, the potential emissions based on 8760 hours is  $53200 \times 8760 / 2000 =$  **233016 lb / yr**

These calculations are based on average capacity of 35 parts per hour. The maximum capacity if 50 parts per hour. Therefore, uncontrolled emissions based on the maximum hourly capacity of 50 parts per hour is  $233016 \times 50 / 35 =$  **332880 lb / yr PM uncontrolled**  
**166.44 tons / yr PM uncontrolled**

The references from AP 42 emissions factors, section 10.5, lists the emissions from sander at a woodworking waste collection operation. In tests conducted after a cyclone, 52.9 % of total PM is PM 10 and the fabric filter showed 32.1 % of total PM was PM 10. As a conservative estimate, the source assumed 50 % of PM is PM 10

**Maximum emissions, PM 10 = Maximum emissions, PM\*0.5                      83.22 TPY of PM 10 uncontrolled emissions**

## Appendix A: Emission Calculations

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### *Potential Emissions from Entire source*

**Company Name:** Nu-Wood Company, LLC  
**Address City IN Zip:** 2508 Industrial drive Goshen Indiana  
**FESOP** F039-18016-00586  
**Reviewer:** RT/ EVP  
**Date:** December 17, 2003

Emission Unit	PM	PM-10	SO2	NOx	VOC	CO	Single	HAPS
	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	(tons / yr)	HAP	(tons / yr)
Spray Booth 1	4.87	4.87	0	0	7.48	0	0.76 (Glycol Ethers)	0.76
Spray Booth 2	3.25	3.25	0	0	4.98	0	0.51 (Glycol Ethers)	0.51
Spary Booth 3	11.7	11.7	0	0	1.42	0	1.27 (Glycol Ethers)	1.27
Spray Booth4	8.19	8.19	0	0	0.99	0	0.89 (Glycol Ethers)	0.89
Urethane Molding	0	0	0	0	0.04	0	0.04	0.04
Sanding and Finishing Operation	83.22	83.22	0	0	0	0	0	0
Solvent Cleaning	0	0	0	0	1.67		1.43	1.67
<b>Total</b>	111.23	111.23	0	0	16.58	0		5.14